

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
Plaintiff,)
)
v.) COURT NO. 1:11-cr-10286
)
CATHERINE E. GREIG,)
a/k/a Carol Gasko,)
a/k/a Carol Gasco,)
a/k/a Helen Marshall,)
a/k/a Carol Shapeton,)
a/k/a Mrs. Thomas Baxter,)
a/k/a J.L.,)
a/k/a P.M.,)
a/k/a N.S.,)
a/k/a J.W.,)
a/k/a C.L.,)
Defendant.)
)

AFFIDAVIT SUPPORTING UNITED STATES'
APPLICATION FOR WRIT OF GARNISHMENT

I, Christopher R. Donato, Assistant U.S. Attorney, state under oath that:

1. I am an Assistant U.S. Attorney and serve as Chief of the United States Attorney's Financial Litigation Unit. One of my duties is to enforce criminal monetary judgments.
2. On April 25, 1997, an arrest warrant was issued against CATHERINE E. GREIG, a/k/a Carol Gasko, a/k/a Carol Gasco, a/k/a Helen Marshall, a/k/a Carol Shapeton, a/k/a Mrs. Thomas Baxter, a/k/a J.L., a/k/a P.M., a/k/a N.S., a/k/a J.W., a/k/a C.L., (hereinafter "Greig") in the United States District Court of Massachusetts.

3. On June 22, 2011, Greig was arrested in the Central District of California.
4. On August 11, 2011, Greig was indicted in the United States District Court of Massachusetts.
5. Defendant's mother, Jenit L. Greig, died November 13, 2006 and her estate was probated by petition filed June 19, 2008 as case number 08P1162P1 in the Suffolk County Probate Court. Her heirs are listed thereon as Margaret McCusker of South Boston and Catherine Greig, "whereabouts unknown." By deed dated July 23, 2011, Catherine Greig conveyed her fractional interest to Margaret A. McCusker for nominal consideration by deed recorded with Suffolk County Registry of Deeds on July 25, 2011 in Book 48181, Page 63.
6. On March 14, 2012, Greig entered into a Plea Agreement and pled guilty to conspiracy to harbor a fugitive in violation of 18 U.S.C. § 371; conspiracy to commit identity fraud in violation of 18 U.S.C. § 1028(f); and identity fraud in violation of 18 U.S.C. § 1028(a)(7). Pursuant to 28 U.S.C. § 3101(b)(B), Greig "has or is about to assign, dispose, remove, conceal, ill treat, waste, or destroy property with the effect of hindering, delaying, or defrauding the United States."

7. According to Greig's Statement of Facts, from January 1995 through June 22, 2011, Greig harbored and concealed James J. Bulger ("Bulger") from law enforcement. See Docket Entry #60. Greig engaged in conduct that was intended to help Bulger avoid detection from law enforcement and to provide him with support and assistance during his flight from law enforcement. See Docket Entry #60. Pursuant to 28 U.S.C. § 3101(b)(D), Greig "evaded service of process by concealing herself and Bulger with the effect of hindering, delaying, and defrauding the United States."
8. Upon information and belief, I have learned that Greig holds significant assets and/or funds.
9. The United States contends there is a strong likelihood that this Court will impose significant criminal monetary penalties.
10. The United States seeks to preserve Greig's financial assets through prejudgment garnishment remedy set forth in 28 U.S.C. § 3104(a) and (b) to enforce any criminal monetary penalties that this Court may order against Greig.

11. Therefore, in submitting this Application for Writ of Garnishment, I seek to ensure that funds being held by Eastern Bank be made available to the United States to satisfy any and/or all criminal monetary penalties that this Court may impose.

Respectfully submitted,

UNITED STATES OF AMERICA
By its attorneys

CARMEN M. ORTIZ
United States Attorney

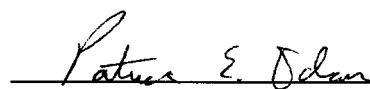
By:


CHRISTOPHER R. DONATO
Assistant U.S. Attorney
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3303

Dated: 3/16/12

Subscribed and sworn to before me this 16th day of March 20 12.

3/16/12
Date


NOTARY PUBLIC

My commission expires:

